

REMARKS

In the final Office Action, the Examiner makes the following observations:

- claims 115 and 118-120 are constructively withdrawn is allegedly being directed to non-elected invention in a prior response to a restriction requirement;
- the specification is objected to as allegedly failing to provide antecedent basis for certain claim features;
- claim 117 is objected to due to alleged minor informalities;
- claims 116-117 are rejected under 35 U.S.C. § 112, second paragraph, as allegedly indefinite;
- claims 116 and 117 are rejected under 35 U.S.C. § 101 as allegedly directed to non-statutory subject matter;
- claims 97, 98, 100-102, 104-114, 116, and 117 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over GINTER (U.S. Patent No. 5,892,900) in view of COLEY (U.S. Patent No. 5,751,914);
- claim 99 is rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over GINTER and COLEY as applied to claim 97, and further in view of AUGUST (U.S. Patent No. 5,633,922); and
- claims 97-102, 104-114, 116, and 117 are rejected on the grounds of non-statutory obviousness-type double patenting as allegedly unpatentable over claims 1-17 of U.S. Patent No. 6,381,644, claims 1-21 of U.S. Patent No. 6,377,993, claims 1-23 of U.S. Patent No. 6,385,644, claims 1-8 of U.S. Patent No. 6,470,386, claims 1-20 of U.S. Patent No. 6,490,620, claims 1-34 of U.S. Patent No. 6,574,661, claims 1-21 of U.S. Patent No. 6,598,167, claims 1-26 of U.S. Patent No. 6,606,708, claims 1-73 of U.S. Patent No. 6,611,498, claims 1-10 of U.S. Patent No. 6,745,229, claims 1-11 of U.S. Patent No. 6,763,376, claims 1-20 of U.S. Patent No. 6,968,571, and claims 1-11 of U.S. Patent No. 7,058,600.

Applicants respectfully traverse the constructive election, the objections, and the rejections.

By way of the present amendment, Applicants propose to amend claims 97, 98, 110, 116, and 117 to improve form. No new matter has been added by way of the present amendment. Claims 97-102 and 104-120 are pending, including claims 115 and 118-120 that were constructively withdrawn in the final Office Action.

Improper Final Rejection

As an initial observation, Applicants respectfully submit that the finality of the present Office Action is clearly improper. In the non-final Office Action, dated September 24, 2009, the Examiner rejected claims 97-102 and 104-115 based on a reference (U.S. Patent No. 6,683,870 to ARCHER) that was not citable against the present application under 35 U.S.C. § 103(a) (see pages 15 and 16 of the prior Amendment, dated December 23, 2009). Therefore, a proper art-based rejection under 35 U.S.C. § 103(a), with respect to claims 97-102 and 104-115, was not included in the prior Office Action. Applicants respectfully submit that the lack of a proper art-based rejection of claims 97-102 and 104-115 in the prior Office Action precludes the finality of the present Office Action that includes a new art-based rejection of pending claims 97-102, and 104-114 because such a rejection constitutes new grounds of rejection that have not been necessitated by either a claim amendment or based on information from an Information Disclosure Statement (see M.P.E.P. § 706.07(a)).

Accordingly, Applicants submit that the finality of the present Office Action must be withdrawn.

Election/Restriction

In the final Office Action, at pages 2 and 3, the Examiner constructively withdrew method claims 115 and 118-120 because these claims are allegedly directed to non-elected group in a prior response to a restriction requirement, made final in an Office Action dated December 4, 2001. Applicants respectfully note, however, that Applicants' election with traverse, of September 10, 2001, included method claim 96 as a linking

claim, and that claim 96 was entered in the Office Action dated December 4, 2001 that made the restriction requirement final. Applicants further submit that claim 115, which was added through an Amendment dated July 11, 2006, corresponds to linking method claim 96, which was canceled therein. Consequently, Applicants respectfully submit that claim 115, as presented in Applicants' response dated December 23, 2009, falls within the scope of the group elected in Applicants' response dated September 10, 2001.

Moreover Applicants respectfully note that claim 115 has been previously reviewed in six Office Actions (including three final Office Actions) and that any new election/restriction requirement related to claim 115 is clearly improper (see M.P.E.P. § 811).

For at least these reasons, the constructive withdrawal of claim 115 is clearly improper. Likewise, claims 118-120 depend from claim 115 and the constructive withdrawal of claims 118-120 is clearly improper for the reasons presented above with respect to claim 115. Accordingly, reconsideration of the constructive withdrawal of claims 115 and 118-120 and consideration of these claims are respectfully requested.

Objection to the Specification

The Examiner objects to the Specification as allegedly failing to provide proper antecedent basis for certain claimed subject matter. Applicants respectfully traverse this objection.

Without acquiescing in this objection and merely to expedite examination, Applicants propose to claims 98 and 110 to recite a "toll free network," as expressly disclosed in the Specification, for example, at the paragraph beginning at line 11 of page

4. With respect to the feature of a “priced call applications” recited in claim 106, Applicants respectfully submit this feature was recited in present application, as originally submitted, for example, in claim 88 at page 432.

For at least these reasons, reconsideration and withdrawal of the objection to Specification are respectfully requested.

Objection to the Claims

Claim 117 stands objected due to alleged minor informalities. Without acquiescing in this objection and merely to expedite prosecution, Applicants propose to amend claim 117, herein, to address the concerns raised by the Examiner in the final Office Action at page 3. Accordingly, Applicants respectfully request that the objection to claim 117 be reconsidered and withdrawn.

Rejection under 35 U.S.C. § 112, Second Paragraph

Claims 116 and 117 stand rejected under 35 U.S.C. § 112, second paragraph, as allegedly indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Without acquiescing in this rejection and in order to expedite prosecution, Applicants propose to amend claims 116 and 117 to address the clarity concerns raised by the Examiner in the final Office Action at pages 4-6. Accordingly, Applicants respectfully request that the rejection of claims 116 and 117 under 35 U.S.C. § 112, second paragraph be reconsidered and withdrawn.

Rejection under 35 U.S.C. § 101

Claims 116 and 117 stand rejected under 35 U.S.C. § 101 as allegedly directed to non-statutory subject matter. In particular, the Examiner rejects claims 116 and 117 in connection with the indefiniteness concerns raised under 35 U.S.C. § 112, second paragraph (final Office Action at pages 5 and 6). Accordingly, Applicants respectfully request that the rejection of claims 116 and 117 under 35 U.S.C. § 101 be reconsidered and withdrawn for reasons presented above with respect to the rejection of these claims under 35 U.S.C. § 112, second paragraph.

Rejection under 35 U.S.C. § 103(a) based on GINTER and COLEY

Claims 97, 98, 100-102, 104-114, 116, and 117 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over GINTER in view of COLEY. Applicants respectfully traverse this rejection.

Independent claim 97, amended as proposed, is directed to an integrated and secure system for conducting business over a public Internet by enabling a customer, of a communications network, to command and control the customer's switched communications connections within the communications network and to view results of any changes in the customer's connections, the system comprising: at least one secure web server that manages secure customer sessions with a customer workstation over the public Internet, the at least one secure web server providing session management for the customer, the session management including: identification of the customer, validation of the customer, determining entitlements of the customer, and performing encryption of the secure customer sessions. The system further includes at least one dispatch server that

communicates with the at least one secure web server and a plurality of system resources, where the at least one dispatch server provides verification of the customer's entitlements, and based on the customer's entitlements, forwards messages to a proxy associated with a desired service. The plurality of system resources include a network manager which manages routing of traffic, associated with the user, over the communications network, and a graphical user interface application to review, in real-time, the traffic associated with the customer, the network manager and the graphical user interface application being responsive to messages from the dispatch server, where the network manager and the graphical user interface application command and control circuit networks provided by the communications network to the customer. GINTER and COLEY do not disclose one or more of these features.

For example, GINTER and COLEY do not disclose or suggest a graphical user interface application to review, in real-time, the traffic associated with the customer, the network manager and the graphical user interface application being responsive to messages from the dispatch server, where the network manager and the graphical user interface application command and control circuit networks provided by the communications network to the customer. The Examiner admits that GINTER does not disclose or suggest a substantially similar feature recited in claim 97, as previously presented, and alleges that COLEY discloses an event detection application 74 at col. 8, lines 13-41 and controlling network communications at cols. 5 and 6 (final Office Action at page 9). Applicants respectfully disagree with the Examiner's interpretation of COLEY.

As an initial observation, Applicants respectfully submit that claim 97 does not recite monitoring of network traffic and controlling network communications, as alleged by the Examiner in the final Office Action at page 9. Rather, as described above, claim 97 recites a graphical user interface application to review, in real-time, traffic associated with the customer, a network manager and the graphical user interface application being responsive to messages from a dispatch server, where the network manager and the graphical user interface application command and control circuit networks provided by the communications network to the customer. **Since the rejection does not address this expressly recited claim feature of claim 97, the Examiner has failed to present *prima facie* obviousness, and this rejection under 35 U.S.C. § 103 is *per se* improper (M.P.E.P. § 2143.03).** Applicants further submit that the cited sections of COLEY do not disclose or suggest the above-identified features of claim 97.

Col. 8, lines 13-41 of COLEY states:

With reference now to FIG. 9, there is illustrated a preferred embodiment of a flowchart utilized by event correlation engine 60 of FIG. 3 to process events within data processing system 8. As will be appreciated by those skilled in the art, although the flowchart illustrated in FIG. 9 is sequential in structure, the steps illustrated therein are implemented by object-oriented software which performs many of the illustrated actions in parallel. As the process begins at block 170, event detection applications 74, which in a preferred embodiment of the present invention comprise network "listening" programs such as Trap d available from IBM Corporation, monitor network traffic within communications links 34 and 35 in order to detect events within data processing system 8. The process proceeds from block 170 to block 172, which illustrates determining whether any events, for example, SNMP traps, CMIP CMIS events, or RPC communications, have been detected. If not, the process loops at block 172 until an event is detected. In response to the detection of an event, event detection applications 74 forward the detected event to event converter 76. The process then proceeds from block 172 to block 174, which illustrates event converter 76 parsing each detected event into an internal event object, which comprises a uniform data structure that describes the detected event. For example, event converter 76 receives

SNMP V1 and V2 traps, CMIP CMIS events, and RPC communications and maps each event type into a standard internal event object format. Event converter 76 then passes the internal event object to rule processor 78 as depicted at block 176.

This section of COLEY discloses, for example, that event detection applications 74 monitor network traffic within communications links 34 and 35 (box 170) until an event is detected (box 172) and forward data about the detected event to an event converter 76 (box 174) that forms an event object summarizing the detected event. The Examiner appears to allege that monitoring network traffic, by the event detection applications 74, corresponds to a graphical user interface application to review, in real-time, the traffic associated with the customer (on a communications network), as recited in claim 97. Applicants respectfully submit, however, that this section of COLEY does not disclose any type of graphical user interface application, let alone a graphical user interface application to review, in real-time, the traffic associated with the customer. Rather, as described above, this section of COLEY discloses that the event detection applications 74 monitor network traffic within communications links 34 and 35 (boxes 170 and 172) and forwards information about a detected event to event converter 76 to form an event object (box 174).

Applicants likewise submit that that this and other sections of COLEY generally relate to monitoring events in a data processing system 8 (e.g., COLEY at col. 3, lines 8-22), and do not relate, in any way, to reviewing, in real-time, the traffic associated with the customer (on a communications network), as recited in claim 97.

Moreover, since this section of COLEY does not disclose or suggest a graphical user interface application, this section of COLEY cannot be reasonably construed to disclose or suggest a graphical user interface application that is responsive to messages

from a dispatch server (that provides verification of the customer's entitlements, and based on the customer's entitlements, forwards messages to a proxy associated with a desired service) or that commands and controls circuit networks provided by a communications network to the customer, as further recited in claim 97.

For at least these reasons, col. 8, lines 13-41 of COLEY does not disclose or suggest a graphical user interface application to review, in real-time, the traffic associated with the customer, the network manager and the graphical user interface application being responsive to messages from the dispatch server, where the network manager and the graphical user interface application command and control circuit networks provided by the communications network to the customer, as recited in claim 97, amended as proposed.

Cols. 5 and 6 of COLEY disclose, for example, various template icons 104, where a rule editor 72 includes a drawing window 102 that enables a user to construct a rule, using the templates icons 104, to define conditions and network locations for distributing a form event object that summarizes an observed event (see, for example, COLEY at col. 4, line 51-col. 5, lines 3 and FIG. 4). Thus, Applicants respectfully submit that this section of COLEY does not disclose or suggest, for example, a graphical user interface application to review, in real-time, traffic associated with a customer or that the graphical user interface application is to command and control circuit networks provided by the communications network to the customer, as recited in claim 97, amended as proposed. Rather, as described above, the template icons 104 are used to define a distribution of the event object summarizing the observed event, and do not relate, in any way, to command

and control of circuit networks provided by the communications network to the customer, as recited in claim 97.

For at least these reasons, cols. 5 and 6 of COLEY do not disclose or suggest a graphical user interface application to review, in real-time, the traffic associated with the customer, the network manager and the graphical user interface application being responsive to messages from the dispatch server, where the network manager and the graphical user interface application command and control circuit networks provided by the communications network to the customer, as recited in claim 97, amended as proposed.

For at least the foregoing reasons, Applicants submit that claim 97, amended as proposed, is patentable over GINTER and COLEY, whether taken alone or in any reasonable combination. Claims 98, 100-102, 104-109, and 116 depend from claim 97. Therefore, these claims are patentable over GINTER and COLEY, whether taken alone or in any reasonable combination, for at least the reasons set forth above with respect to claim 97. Accordingly, Applicants respectfully request that the rejection of claims 97, 98, 100-102, 104-109, and 116 under 35 U.S.C. § 103(a) based on GINTER and COLEY be reconsidered and withdrawn. Furthermore, Applicants submit that these claims are further patentable over GINTER and COLEY, under 35 U.S.C. § 103(a), for separate reasons.

For example, the Examiner does not address, in any way, at least one dispatch server that is further to establish a secure session between the network manager and the customer workstation via a data path that includes the at least one dispatch server, and establish another secure session between the graphical user interface application and the

customer workstation via a path that excludes the at least one dispatch server, as recited in claim 116, amended as proposed. **Since the rejection does not address any of the recited claim features of claim 116, the Examiner has failed to present *prima facie* obviousness, and this rejection under 35 U.S.C. § 103 is *per se* improper (M.P.E.P. § 2143.03).** Moreover, Applicants respectfully submit that neither GINTER nor COLEY discloses or suggests the features recited in claim 116.

For at least these additional reasons, Applicants respectfully submit that claim 116 is separately patentable under 35 U.S.C. § 103(a) in view of GINTER and COLEY, taken alone or in any reasonable combination. Accordingly, Applicants respectfully request that the rejection of claim 116, under 35 U.S.C. § 103(a) based on GINTER and COLEY, be reconsidered and withdrawn for at least these additional reasons.

Independent claims 110 recites, for example, an integrated and secure system for conducting business over a public Internet by enabling a customer, of a communications network, to command and control the customer's switched communications connections within the communications network and to view results of any changes in the customer's connections, the system comprising: at least one secure web server that manages secure customer sessions with a customer workstation over the public Internet, the at least one secure web server providing session management for the customer, the session management including: identification of the customer, validation of the customer, determining entitlements of the customer and performing encryption of the secure customer sessions; at least one dispatch server that communicates with the at least one secure web server and a plurality of system resources, where the at least one dispatch server provides verification of the customer's entitlements, and based on the customer's

entitlements, forwards messages to a proxy associated with a desired service; and the plurality of system resources including a toll free network manager which manages routing of the customer's traffic over toll free networks in the communications network, and a real time monitor which provides near real time monitoring of network traffic,

where the toll free network manager and the real time monitor respond to messages from the dispatch server and manage the communications network resources provided by the communications network to the customer in near real time. GINTER and COLEY do not disclose or suggest one or more of these features.

For example, GINTER and COLEY do not disclose or suggest a plurality of system resources including a toll free network manager which manages routing of the customer's traffic over toll free networks in the communications network, and a real time monitor which provides near real time monitoring of network traffic, where the toll free network manager and the real time monitor respond to messages from the dispatch server and manage the communications network resources provided by the communications network to the customer in near real time. Applicants respectfully note that although the Examiner lists claim 110 in final Office Action at page 7, the Examiner does not address, in any way, the above identified features of claim 110. The Examiner appears to allege that claim 110 is rejected for reasons similar to the reasons presented with respect to claim 97. Applicants respectfully note, however, that claim 97 does not recite the above identified features of claim 110. **Since the rejection does not address, in any way, the above-identified recited features of claim 110, the Examiner has failed to present *prima facie* obviousness, and this rejection under 35 U.S.C. § 103 is *per se* improper (M.P.E.P. § 2143.03).** Moreover, Applicants respectfully submit that neither GINTER

nor COLEY disclose or suggest either the toll free network manager or the real time monitor recited in claim 110.

Claim 110 is, therefore, patentable over GINTER and COLEY, whether taken alone or in any reasonable combination. Claims 111-114 and 117 depend from claim 110 and are, therefore, patentable over GINTER and COLEY, whether taken alone or in any reasonable combination, for at least the reasons set forth above with respect to claim 110. Accordingly, Applicants respectfully request that the rejection of claims 110-114 and 117, under 35 U.S.C. § 103(a) based on GINTER and COLEY, be reconsidered and withdrawn. Furthermore, Applicants submit that these claims are further patentable over GINTER and COLEY, under 35 U.S.C. § 103(a), for separate reasons.

For example, the Examiner does not address, in any way, at least one dispatch server is further to establish a secure session between the network manager and the customer workstation via a data path that includes the at least one dispatch server, and establish another secure session between the graphical user interface application and the customer workstation via a path that excludes the at least one dispatch server, as recited in claim 117, amended as proposed. **Since the rejection does not address any of the recited claim features of claim 117, the Examiner has failed to present *prima facie* obviousness, and this rejection under 35 U.S.C. § 103 is *per se* improper (M.P.E.P. § 2143.03).** Moreover, Applicants respectfully submit that neither GINTER nor COLEY discloses or suggests the features recited in claim 117.

For at least these additional reasons, Applicants respectfully submit that claim 117 is separately patentable under 35 U.S.C. § 103(a) in view of GINTER and COLEY, taken alone or in any reasonable combination. Accordingly, Applicants respectfully request

that the rejection of claim 117, under 35 U.S.C. § 103(a) based on GINTER and COLEY, be reconsidered and withdrawn for at least these additional reasons.

Rejection under 35 U.S.C. § 103(a) based on GINTER, COLEY, and AUGUST

Claim 99 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over GINTER in view of COLEY, and further in view of AUGUST. Applicants respectfully traverse this rejection.

Claim 99 depends from claim 97. Without acquiescing in the Examiner's rejection of claim 99, Applicants submit that the disclosure of AUGUST does not remedy the deficiencies in the disclosures of GINTER and COLEY set forth above with respect to claim 97. Applicants, therefore, submit that claim 99 is patentable over GINTER, COLEY, and AUGUST, whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 97. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 99 under 35 U.S.C. § 103(a) based on GINTER, COLEY, and AUGUST.

Rejections on the Grounds of Non-Statutory Obviousness-Type Double Patenting

Claims 97-102, 104-114, 116, and 117 are rejected on the grounds of non-statutory obviousness-type double patenting as allegedly unpatentable over claims 1-17 of U.S. Patent No. 6,381,644, claims 1-21 of U.S. Patent No. 6,377,993, claims 1-23 of U.S. Patent No. 6,385,644, claims 1-8 of U.S. Patent No. 6,470,386, claims 1-20 of U.S. Patent No. 6,490,620, claims 1-34 of U.S. Patent No. 6,574,661, claims 1-21 of U.S. Patent No. 6,598,167, claims 1-26 of U.S. Patent No. 6,606,708, claims 1-73 of U.S.

Patent No. 6,611,498, claims 1-10 of U.S. Patent No. 6,745,229, claims 1-11 of U.S.

Patent No. 6,763,376, claims 1-20 of U.S. Patent No. 6,968,571, and claims 1-11 of U.S.

Patent No. 7,058,600. Applicants respectfully traverse this rejection.

Applicants respectfully submit that these non-statutory obviousness-type double patenting rejection are improper and should be withdrawn because the Examiner has not made clear (a) the differences between the inventions defined by the conflicting claims – a claim in one patent application compared to a claim in the other patent application; and (b) the reasons why a person of ordinary skill in the art would conclude that the invention defined in the claim at issue would have been an obvious variation of the invention defined in a claim of the other patent application (see M.P.E.P. § 804). Likewise, the Applicants further submit that there are significant differences between the features recited in claims 97-102, 104-114, 116, and 117 and the identified claims in U.S. Patent Nos. 6,381,644, 6,377,993, 6,385,644, 6,470,386, 6,490,620, 6,574,661, 6,598,167, 6,606,708, 6,611,498, 6,745,229, 6,763,376, 6,968,571, and 7,058,600 (“the co-owned patents”).

In response to similar arguments presented in Applicants prior amendment dated December 23, 2009, the Examiner appears allege that (1) many of the features recited system claims 97-102, 103-114, 116, and 117 relate to functional features, citing to M.P.E.P. § 2114 for support; and (2) that the “structural” features recited in these claims, when considered without the functional features, are anticipated by the claims of the co-owned patents (final Office Action at pages 19-22). Applicants respectfully disagree with both of these allegations.

Regarding the Examiner's apparent dismissal of functional features expressly recited in claims 97-102, 103-113, 116, and 117, Applicants respectfully submit that functional features must be evaluated and considered, just like any other features of the claim, for what it fairly conveys to a person of ordinary skill in the pertinent art in the context in which it is used (M.P.E.P. § 2173.05(g)). Although the Examiner alleges in the final Office Action at pages 20 and 21 that claims 97-102, 103-113, 116, and 117 are anticipated by the identified claims in the co-owned patents, anticipation requires that a reference expressly or inherently teach every aspect of the claimed invention (M.P.E.P. § 2131). Applicants respectfully submit that the Examiner has not alleged or shown that the functional features recited in claims 97-102, 103-113, 116, and 117 are inherently or expressly disclosed in the co-owned patents.

Moreover, Applicants respectfully submit that systems claims 97-102, 103-113, 116, and 117 recite structural features that differ from the features recited in the identified claims of the co-owned patents. For example, none of the co-owned patent recite a graphical user interface application, let alone, a graphical user interface application to review, in real-time, the traffic associated with the customer, the network manager and the graphical user interface application being responsive to messages from the dispatch server, where the network manager and the graphical user interface application command and control circuit networks provided by the communications network to the customer, as recited in claim 97. For example, the Examiner appears to take the position, without any support or explanation, that a network configuration device recited in claim 1 of U.S. Patent No. 6,381,644 corresponds, somehow, to the graphical user interface application recited in claim 97.

Likewise, the identified claims in the co-owned patents do not disclose a plurality of system resources including a toll free network manager which manages routing of the customer's traffic over toll free networks in the communications network, and a real time monitor which provides near real time monitoring of network traffic, as recited in claim 110.

For at least these reasons, Applicants respectfully request that the rejection of claims 97-102, 104-114, 116, and 117 on the grounds of non-statutory obviousness-type double patenting based on the identified claims of the co-owned patents be reconsidered and withdrawn.

Conclusion

In view of the foregoing proposed amendments and remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the claims. Applicants respectfully request that the Examiner enter the amendment because the amendment does not raise new issues or require a further search of the art. Moreover, Applicants respectfully submit that the proposed amendment places the present application in condition for allowance. In addition, Applicants respectfully submit that entry of this proposed amendment would place the application in better form for appeal in the event that the application is not allowed.

As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such assertions (e.g., whether a reference constitutes prior art, reasons to modify a reference and/or to combine

references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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